IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

Al Shimari et al.,)
Plaintiff,)
v.) Civil Action No. 1:08-cv-00827 (GBL/JFA)
CACI International, Inc. et al.,)
Defendants.)
)
)

UNOPPOSED MOTION OF PLAINTIFFS TO EXTEND TIME TO RESPOND TO DEFENDANT CACI'S MOTION TO DISMISS BY THREE DAYS

Plaintiffs respectfully request that the Court extend until October 16, 2008, the time for Plaintiffs to respond to Defendant CACI's Motion to Dismiss. Plaintiffs' response to this motion is currently due on October 13, 2008, and by this motion Plaintiffs request a three day extension to October 16, 2008. Counsel for Defendant CACI has consented to this modest extension. CACI has noticed this motion for October 24; Plaintiffs requested extension of time will not alter this date.

Defendant CACI filed its motion to dismiss this action on October 2, 2008, after the Court granted CACI permission to exceed the page limit for motions in the Eastern District of Virginia. In their 37-page brief, Defendants present six separate substantive arguments. If allowed the three extra days to respond, Plaintiff intends to file its opposition in accordance with the page limit rule applicable in this District. However, in order to accomplish this, Plaintiffs need additional time to hone and condense their arguments in opposition to CACI's motion to

dismiss. As Mark Twain once said, if he had more time, he would have written a shorter letter. That is the spirit that motivates Plaintiffs in seeking this extension. CACI has consented to this brief extension of time.

Wherefore, Plaintiffs request that the Court enter an Order, in the form attached hereto, extending the time for Plaintiffs to respond to Defendant CACI's Motion to Dismiss from October 13, 2008 to October 16, 2008.

Date: October 3, 2008 Respectfully submitted,

/s/ Susan L. Burke
Susan L. Burke (VA Bar #27769)
William T. O'Neil
William F. Gould
BURKE O'NEIL LLC
4112 Station Street
Philadelphia, PA 19127
(215) 971.5058
Fax (215) 482.0874
sburke@burkeoneil.com

Katherine Gallagher CENTER FOR CONSTITUTIONAL RIGHTS 666 Broadway, 7th Floor New York, NY 10012

Shereef Hadi Akeel AKEEL & VALENTINE, P.C. 888 West Big Beaver Road Troy, Michigan 48084-4736

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of October 2008 I caused a true and correct copy of the foregoing Plaintiff' Consent Motion Requesting and Extension of Time to be served via electronic mail on the following individuals at the address indicated:

William Koegel, Esq. John O'Connor, Esq. Steptoe & Johnson LLP 1330 Connecticut Ave., N.W. Washington D.C. 20036

/s/ Susan L. Burke_

Susan L. Burke (VA Bar #27769) William T. O'Neil William F. Gould BURKE O'NEIL LLC 4112 Station Street Philadelphia, PA 19127 (215) 971.5058 Fax (215) 482.0874 sburke@burkeoneil.com